

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

This Document Relates To:
Converse v. Johnson & Johnson
No. 3:18-cv-17586-MAS-RLS

Newsome v. Johnson & Johnson
No. 3:18-cv-17146-MAS-RLS

Rausa v. Johnson & Johnson
No. 3:20-cv-02947-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,
LLC'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO
EXCLUDE THE OPINIONS OF DR. DANIEL CLARKE-PEARSON**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this

Declaration in Support of Defendants' Memorandum of Law in Support of Motion
to Exclude the Opinions of Dr. Daniel Clarke-Pearson.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the deposition of Daniel L. Clarke-Pearson, January 17, 2024, in the above case.
2. Attached hereto as **Exhibit 2** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson Re: Pasqualina Rausa, May 28, 2024, in the above case.
3. Attached hereto as **Exhibit 3** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson Re: Hilary Converse, May 28, 2024, in the above case.
4. Attached hereto as **Exhibit 4** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson Re: Tamara Newsome, May 28, 2024, in the above case.
5. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, March 8, 2024, in the above case.
6. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, August 26, 2021, in the above case.

7. Attached hereto as **Exhibit 7** is a true and correct copy of Penninkilampi & Eslick, *Perineal Talc Use and Ovarian Cancer: A Systematic Review and Meta-Analysis*, 29(1) *Epidemiology* 41 (2018).
8. Attached hereto as **Exhibit 8** is a true and correct copy of the transcript of the deposition of Jack Siemiatycki, March 27, 2024, in the above case.
9. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts of the transcript of the deposition of Peter Schwartz, January 28, 2021, in the above case.
10. Attached hereto as **Exhibit 10** is a true and correct copy of CONVERSE_HILARY_DRPETERSCHWARTZ_00008.
11. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, August 27, 2021, in the above case.
12. Attached hereto as **Exhibit 12** is a true and correct copy of RausaP-DUHSMR-00003.
13. Attached hereto as **Exhibit 13** is a true and correct copy of NEWSOMET_AAMC_C_MDR000295.
14. Attached hereto as **Exhibit 14** is a true and correct copy of NewsomeT-WHSMR-00017.

15. Attached hereto as **Exhibit 15** is a true and correct copy of Saavalainen, *Risk of Gynecologic Cancer According to the Type of Endometriosis*, 131(6) *Obstet. & Gynecol.* 1095 (2018).
16. Attached hereto as **Exhibit 16** is a true and correct copy of Noli, *Long Term Survival of Ovarian Endometriosis Associated Clear Cell and Endometrioid Ovarian Cancers*, 23(2) *Int'l J. Gynecol. Cancer* 244 (2013).
17. Attached hereto as **Exhibit 17** is a true and correct copy of Barnard, *Endometriosis Typology and Ovarian Cancer Risk*, *JAMA* (2024).
18. Attached hereto as **Exhibit 18** is a true and correct copy of Wentzensen & O'Brien, *Talc, Body Powder, and Ovarian Cancer: A Summary of the Epidemiologic Evidence* 163 *Gynecol. Oncol.* 199 (2021).
19. Attached hereto as **Exhibit 19** is a true and correct copy of Berge, *Genital Use of Talc and Risk of Ovarian Cancer: A Meta-analysis*, 27(3) *Eur. J. Cancer Prev.* 248 (2018).
20. Attached hereto as **Exhibit 20** is a true and correct copy of Taher, *Critical Review of the Association Between Perineal Use of Talc Powder and Risk of Ovarian Cancer*, 90 *Reproductive Toxicology* 88 (2019).
21. Attached hereto as **Exhibit 21** is a true and correct copy of Gabriel, *Douching, Talc Use, and Risk for Ovarian Cancer and Conditions Related to Genital Tract Inflammation*, 28(11) *Cancer Epidemiol. Biomarkers Prev* 1835 (2019).

22. Attached hereto as **Exhibit 22** is a true and correct copy of the Report of Michael A. Finan Re: Linda Bondurant, May 28, 2024, in the above case.

23. Attached hereto as **Exhibit 23** is a true and correct copy of Terry, *Genital Powder Use and Risk of Ovarian Cancer: A Pooled Analysis of 8,525 Cases and 9,859 Controls*, 6(8) *Cancer Prev. Res.* 811 (2013).

24. Attached hereto as **Exhibit 24** is a true and correct copy of Cramer, *The Association Between Talc Use and Ovarian Cancer: A Retrospective Case-Control Study in Two US States*, 27(3) *Epidemiology* 334 (2016).

25. Attached hereto as **Exhibit 25** is a true and correct copy of excerpts of the transcript of the deposition of Hilary Converse, December 1, 2020, in the above case.

26. Attached hereto as **Exhibit 26** is a true and correct copy of Phung, *Effects of Risk Factors for Ovarian Cancer in Women With and Without Endometriosis*, 118(5) *Fertil. Steril.* 960 (2022).

27. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, February 4, 2019, in the above case.

28. Attached hereto as **Exhibit 28** is a true and correct copy of O'Brien, *Association of Powder Use in the Genital Area with Risk of Ovarian Cancer*, 323(1) *JAMA* 49 (2020).

29. Attached hereto as **Exhibit 29** is a true and correct copy of Gertig, *Prospective Study of Talc Use and Ovarian Cancer*, 92(3) J. Nat'l Cancer Inst. 249 (2000).

30. Attached hereto as **Exhibit 30** is a true and correct copy of Gates, *Risk Factors for Epithelial Ovarian Cancer by Histologic Subtype*, 171(1) Am. J. Epidemiol. 45 (2010).

31. Attached hereto as **Exhibit 31** is a true and correct copy of Cramer, *Genital Talc Exposure and Risk of Ovarian Cancer*, 81(3) Int'l J. Cancer 351 (1999).

32. Attached hereto as **Exhibit 32** is a true and correct copy of Wong, *Perineal Talc Exposure and Subsequent Epithelial Ovarian Cancer: A Case-Control*, 93(3) Obstet. Gynecol. 372 (1999).

33. Attached hereto as **Exhibit 33** is a true and correct copy of Mills, *Perineal Talc Exposure and Epithelial Ovarian Cancer Risk in the Central Valley of California*, 112(3) Int'l J. Cancer 458 (2004).

34. Attached hereto as **Exhibit 34** is a true and correct copy of Merritt, *Talcum Powder, Chronic Pelvic Inflammation and NSAIDs in Relation to Risk of Epithelial Ovarian Cancer*, 122(1) Int'l J. Cancer 170 (2008).

35. Attached hereto as **Exhibit 35** is a true and correct copy of Rosenblatt, *Genital Powder Exposure and the Risk of Epithelial Ovarian Cancer*, 22 Cancer Causes Control 737 (2011).

36. Attached hereto as **Exhibit 36** is a true and correct copy of the Report of Cheryl Saenz Re: Tamara Newsome, May 28, 2024, in the above case.

37. Attached hereto as **Exhibit 37** is a true and correct copy of the Report of Teri Longacre Re: Tamara Newsome, May 28, 2024, in the above case.

38. Attached hereto as **Exhibit 38** is a true and correct copy of Olsen, *Obesity and Risk of Ovarian Cancer Subtypes: Evidence from the Ovarian Cancer Association Consortium*, 20(2) Endocr. Relat. Cancer 251 (2013).

39. Attached hereto as **Exhibit 39** is a true and correct copy of Gonzalez, *Douching, Talc Use, and Risk of Ovarian Cancer*, 27(6) Epidemiology 797 (2016).

40. Attached hereto as **Exhibit 40** is a true and correct copy of Chang, *Use of Personal Care Product Mixtures and Incident Hormone-Sensitive Cancers in the Sister Study: A U.S.-Wide Prospective Cohort*, 183 Environ. Int'l 1 (2024).

41. Attached hereto as **Exhibit 41** is a true and correct copy of excerpts of the transcript of the deposition of Pasqualina Rausa, January 27, 2021, in the above case.

42. Attached hereto as **Exhibit 42** is a true and correct copy of the Report of John Godleski Re: Tamara Newsome, June 24, 2021, in the above case.

43. Attached hereto as **Exhibit 43** is a true and correct copy of the Report of John Godleski Re: Pasqualina Rausa, June 21, 2021, in the above case.

44. Attached hereto as **Exhibit 44** is a true and correct copy of excerpts of the transcript of the deposition of John Godleski, March 29, 2024, in the above case.

45. Attached hereto as **Exhibit 45** is a true and correct copy of excerpts of the transcript of the deposition of John Godleski, March 28, 2024, in the above case.

46. Attached hereto as **Exhibit 46** is a true and correct copy of Cramer, *Presence of Talc in Pelvic Lymph Nodes of a Woman With Ovarian Cancer and Long-Term Genital Exposure to Cosmetic Talc*, 110(2) *Obstetrics & Gynecology* 498 (2007).

47. Attached hereto as **Exhibit 47** is a true and correct copy of Heller, *The Relationship Between Perineal Cosmetic Talc Usage and Ovarian Talc Particle Burden*, 174(5) *Am. J. Obstet. Gynecol.* 1507 (1996).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 23, 2024



Jessica Davidson